

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Caption:

HARA Y JEFFRIES

Full name(s) of Plaintiff(s)

AMMENDED,  
COMPLAINT  
FOR EMPLOYMENT  
DISCRIMINATION

v.

TEEN CHALLENGE - CHALLENGE  
TRAINING CENTER  
MRS. BETH J. BRANSKY  
Full name(s) of Defendant(s) HUMAN RESOURCES MANAGER

CIVIL ACTION  
NO. 14-5755

This action is brought for discrimination in employment pursuant to (check only those that apply):

☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).  
*NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634.  
*NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission, and you must have been at least 40 years old at the time you believe that you were discriminated against.*

☐ Americans with Disability Act of 1990, as codified, 42 U.S.C. §§ 12112-12117.  
*NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

☐ Pennsylvania Human Relations Act, as codified, 43 Pa. Cons. Stat. §§ 951-963 (race, color, family status, religious creed, ancestry, handicap or disability, age, sex, national origin, the use of a guide or support animal because of blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals).

**NOTE:** In order to bring suit in federal district court under the Pennsylvania Human Relations Act, you must first file a complaint with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations, and then you must wait one year prior to filing a lawsuit.

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name: HARRY JEFFRIES  
 Street Address: 150 S. 4TH STREET  
 County, City: BERKS Reading  
 State & Zip: P.A. 19602  
 Telephone Number: \_\_\_\_\_

- B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page. Attach additional sheets of paper as necessary.

Defendant Name: MRS. BETH DOR BRANSKY  
 Street Address: 33 TEEN CHALLENGE ROAD  
 County, City: BERKS COUNTY  
 State & Zip: P.A. 19550  
 Telephone Number: 717-933-4182

- C. The address at which I sought employment or was employed by the defendant(s) is:

Employer: TEEN CHALLENGE TRAINING CENTER  
 Street Address: 33 TEEN CHALLENGE RD.  
 County, City: BERKS 19550  
 State & Zip: P.A. 19550  
 Telephone Number: 717-933-4182

**II. Statement of the Claim**

- A. The discriminatory conduct of which I complain in this action includes (check only those that apply to your case):

☐ Failure to hire me  
☒ Termination of my employment  
☒ Failure to promote me



- ☐ Failure to reasonably accommodate my disability
- ☐ Failure to reasonably accommodate my religion
- ☒ Failure to stop harassment
- ☒ Unequal terms and conditions of my employment
- ☒ Retaliation

☒ Other (specify): Hired Thier PERSONAL ATTORNEY NON-TEEN CHALLENGE LAWYERS

NOTE: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court. FOUR BLOCKS FROM MY HOME

B. It is my best recollection that the alleged discriminatory acts occurred or began on or about: (month) 07-10-10, (day) 10, (year) 2010.

C. I believe that the defendant(s) (check one):

- ☒ is still committing these acts against me.
- ☐ is **not** still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check only those that apply and state the basis for discrimination, for example, what is your religion, if religious discrimination is alleged):

- ☒ race \_\_\_\_\_ ☒ color \_\_\_\_\_
- ☐ religion \_\_\_\_\_ ☒ gender/sex \_\_\_\_\_
- ☐ national origin \_\_\_\_\_

☐ age My date of birth is 01-12-68 (Give your date of birth only if you are asserting a claim of age discrimination)

E. The facts of my case are as follow (attach additional sheets of paper as necessary):

I WAS EMPLOYED BY TEEN CHALLENGE TRAINING CENTER AFTER I GRADUATED FROM thier ONE YEAR PROGRAM TO A EXTENDED TRAINING. THE HUMAN RESOURCE MANAGER HAD CALLED ME TO HER OFFICE THEN SHE FOLLOWED BY TOUCHING ME IN APPROPRIATELY ON BUTTUCKS MY BUTTUCKS I COMPLAINED 3 THREE TIMES WE HAD THREE MEETINGS ABOUT THE PROBLEM. MY SELF AND THE PRESIDENT DR. -3- JOE BATLUK AND JIM WEST ALSO DARLENE PUND T I HAD SOME HELP MY CO WORKERS TOOK ME TO MEET WITH THE HUMANS RELATIONS INVESTIGATOR

Teen CHALLENGE TRAINING Center  
WAS CHARGED AND BETH DORBRANSKY  
AS SO SHE WAS CONSEQUENTLY SERVED  
TWICE AND BOTH TIMES JOE BUTLUCK HAS  
CONTINUED HIS DISHONEST EFFORT TO KEEP  
THIS WHOLE THING HID FROM THE BOARD  
OF DIRECTOR IN MISSOURI. TEEN CHALLENGE  
I NEVER WANTED WAS FOR HER TO  
STOP I ASKED DR. BATLUCK AND HE  
ASSURED ME THAT WOULD NOT HAPPEN  
AGAIN WHEN THE HUMANS RELATIONS  
SERVED HER MRS. BETH DORBRANSKY  
AND TEEN CHALLENGE TRAINING  
CENTER I WAS THREE WEEK AFTER  
TERMINATED. ALSO I WAS NOT  
THE FIRST MAN WHO COMPLAINED  
ABOUT MRS. BETH DORBRANSKY  
ANOTHER STUDENT BEFORE ME ALSO  
COMPLAINED AGAINST MRS. DORBRANSKY  
AND WAS LATER TERMINATED



**NOTE:** As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the Pennsylvania Human Relations Commission, or the Philadelphia Commission on Human Relations.

**III. Exhaustion of Administrative Remedies:**

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on: 08-25-2010 (Date).
- B. The Equal Employment Opportunity Commission (check one):

☐ has not issued a Notice of Right to Sue Letter.

☒ Issued a Notice of Right to Sue Letter, which I received on 10-24-2010 (Date). TWO TIMES

**NOTE:** Attach to this complaint a copy of the Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

- C. Only plaintiffs alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (check one):

- ☒ 60 days or more have passed.
- ☐ fewer than 60 days have passed.

- D. It is my best recollection that I filed a charge with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct on: 08-24-2010 (Date).

- E. Since filing my charge of discrimination with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct (check one):

- ☒ One year or more has passed.
- ☐ Less than one year has passed.

**IV. Relief**

**WHEREFORE**, Plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs as well as (*check only those that apply*):

- ☒ Direct the defendant to hire the plaintiff.
- ☒ Direct the defendant to re-employ the plaintiff.
- ☒ Direct the defendant to promote the plaintiff.
- ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- ☐ Direct the defendant to (*specify*): MOVIES ABOUT SEX HARASSMENT PREVENTION
- ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- ☒ Other (*specify*): MAKE A HEALTHY WORK ENVIRONMENT TO TEACH HOW SERIOUS SOME ONE WHO TOUCHES ANOTHER EMPLOYEE SHOULD BE IMMEDIATELY BE ADDRESSED

I declare under penalty of perjury that the foregoing is true and correct.

Signed this \_\_\_ day of \_\_\_\_\_, 20\_\_.

Signature of Plaintiff  
Address

Hany Jeffries

Telephone number

Fax number (*if you have one*)

1-484-334-0680